

Boston Brussels Chicago Dallas Düsseldorf Frankfurt Houston London Los Angeles Miami Milan Munich New York Orange County Paris Rome Seoul Silicon Valley Washington, D.C.

Strategic alliance with MWE China Law Offices (Shanghai)

Michael Kendall Attorney at Law mkendall@mwe.com +1 617 535 4085

February 26, 2016

Mr. Evan Norris Assistant United States Attorney United States Attorney's Office Eastern District of New York 271 Cadman Plaza East Brooklyn, NY 11201-1820 Ms. Lisa Foster Victim-Witness Coordinator United States Attorney's Office Eastern District of New York 271 Cadman Plaza East Brooklyn, NY 11201-1820

Re: CONMEBOL Request for Notification and Restitution

United States v. Charles Blazer, 13 Cr. 602 United States v. Daryll Warner, 13 Cr. 402 United States v. Daryan Warner, 13 Cr. 584 United States v. Fabio Tordin, 15 Cr. 564 United States v. Hawit, et al., 15 Cr. 252 United States v. José Hawilla, 14 Cr. 609 United States v. Luis Bedoya, 15 Cr. 569 United States v. Roger Huguet, 15 Cr. 585 United States v. Sergio Jadue, 15 Cr. 570

United States v. Traffic Sports International, Inc., 14 Cr. 609

United States v. Traffic Sports USA, Inc., 14 Cr. 609

United States v. Zorana Danis, 15 Cr. 240

Dear Mr. Norris and Ms. Foster:

As Mr. Norris is aware, we represent the Confederación Sudamericana de Fútbol, or "CONMEBOL," in connection with the above and related matters.

In a phone call on July 14, 2015, with Mr. Nitze, Ms. Mace, and Mr. Morris of your office, we mentioned CONMEBOL's interest in preserving and timely asserting its rights with respect to asset forfeiture and restitution. Ms. Mace informed us at that time that it was still too early to have meaningful discussions about such issues, but that the government would note CONMEBOL's interest and let us know when the time was right to assert that interest. I am writing to help preserve CONMEBOL's rights and memorialize our interest in pursuing those discussions at the appropriate time.

As you know, the government has generally alleged in the above matters that certain defendants, including but not limited to Traffic, José Hawilla, Alejandro Burzaco, Hugo Jinkis, Mariano Jinkis, Nicolás Leoz, and Eugenio Figueredo, engaged in a pattern of corrupt conduct causing very substantial losses to CONMEBOL.

Mr. Evan Norris February 26, 2016 Page 2

Accordingly, under Federal Rule of Criminal Procedure 60, the Victims' Rights and Restitution Act (VRRA), and the Crime Victims' Rights Act (CVRA), CONMEBOL respectfully requests (1) notice of the proceedings in the above matters and any related civil and criminal actions involving crimes to which CONMEBOL was a victim; (2) an opportunity to reasonably confer with the government regarding restitution in these matters at the appropriate time; and (3) an opportunity to be heard in court in these matters regarding restitution at the appropriate time. See The Department of Justice's Forfeiture Policy Directive 02-1 ("Restoration Guidelines"); see also Attorney General Guidelines for Victim and Witness Assistance at 45 ("Whenever possible, prosecutors should use asset forfeiture to recover assets to return to victims of crime, as permitted by law.") If CONMEBOL needs to separately notify the Department of Justice's Asset Forfeiture and Money Laundering Section to preserve these rights, please let us know and provide the name of the appropriate contact person.

I will serve as CONMEBOL's authorized representative for these purposes under 42 U.S.C. § 10607(e)(2). My contact information appears above. Please also include my colleague Andy Tomback on such communications. His contact information is:

Andrew E. Tomback McDermott Will & Emery LLP 340 Madison Avenue New York, NY 10173-1922 (212) 547-5799 atomback@mwe.com

Please do not hesitate to contact us if you have any questions or concerns about any aspect of this request. We greatly appreciate the Justice Department's consideration of CONMEBOL's rights and remain eager to assist you in pursuing the recovery of CONMEBOL's and others' losses that the defendants may have caused.

Sincerely,

Michael Kendall

cc: Samuel Nitze

Kristin Mace Brian Morris

Andrew E. Tomback

John Kocoras

DM\_US 64706738-2.097299.0011